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Attorney for Defendant
JOSE MANUEL ONTIVEROS VERDUGO

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No: 2:23-CR-0162-DAD
Plaintiff,)	
)	
vs.)	STIPULATION AND ORDER TO CONTINUE
)	STATUS CONFERENCE AND EXCLUDE
JORGE OMAR ARREDONDO-GARCIA, et)	TIME
al.,)	
Defendant.)	District Judge Dale A. Drozd
)	New Date: January 30, 2024
)	Time: 9:30 a.m.
)	

IT IS HEREBY STIPULATED and requested by and between the parties through their respective counsel, ADRIAN KINSELLA, Assistant United States Attorney, attorney for the GOVERNMENT; PATRICK MCCARTHY, attorney for Defendant JORGE OMAR ARREDONDO-GARCIA; DINA SANTOS, attorney for Defendant GREGORIO ONTIVEROS VERDUGO; RACHELLE BARBOUR, attorney for Defendant JOSE MANUEL ONTIVEROS VERDUGO; MARK REICHEL, attorney for Defendant ALBERTO NAVARRO ZAPATA; and MICHAEL LONG, attorney for Defendant WILFREDO F. REYES, that the status conference currently set for November 21, 2023, be continued to Tuesday, January 30, 2024 at 9:30 a.m., and that time be excluded for preparation of counsel.

The indictment in this matter was filed on June 29, 2023. (Doc. 25.) The final Defendant, Jose Manuel Ontiveros Verdugo, made his first appearance on July 21, 2023. (Doc. 51.) The government first produced discovery consisting of approximately 700 pages of Bates-stamped documents and over 73.9 gigabytes of native files, including cell phone databases and

1 other items for defense review, all covered by a protective order. The Government recently
 2 produced over 1400 pages of additional protected discovery pursuant to the stipulated protective
 3 order filed at ECF No. 69. Additional discovery is expected from the Government.

4 Since the start of the case, Defense counsel have been reviewing and analyzing the above,
 5 conducting legal research, meeting with their clients, and otherwise preparing for trial. The
 6 above tasks are ongoing, and the defense requires additional time to review discovery, discuss
 7 the case with their clients and the Government, and continue to prepare. The parties believe that
 8 failure to grant the requested continuance would deny defense counsel the reasonable time
 9 necessary for effective preparation, taking into account the exercise of due diligence.
 10 Additionally, Mr. Mark Reichel was recently substituted in as the attorney of record for
 11 Defendant ZAPATA, replacing this defendant's prior counsel. (Doc. 72.)

12 Accordingly, the parties stipulate and request that the Court exclude time between the
 13 date of the filing of this stipulation through the new status conference date of January 30, 2024
 14 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of
 15 justice served by continuing the case as requested outweigh the interest of the public and the
 16 defendant in a trial within the original date prescribed by the Speedy Trial Act.

17 Date: November 7, 2023

18 /s/ Patrick McCarthy
 19 PATRICK McCARTHY
 20 Attorney for Defendant
 JORGE OMAR ARREDONDO-GARCIA

21 /s/ Dina Santos
 22 DINA SANTOS
 23 Attorneys for Defendant
 GREGORIO ONTIVEROS VERDUGO

24 HEATHER E. WILLIAMS
 25 Federal Defender

26 /s/ Rachelle Barbour
 27 RACHELLE BARBOUR
 28 Attorney for Defendant
 JOSE MANUEL ONTIVEROS VERDUGO

/s/ Mark Reichel
MARK REICHEL
Attorney for Defendant
ALBERTO NAVARRO ZAPATA

/s/ Michael Long
MICHAEL LONG
Attorney for Defendant
WILFREDO F. REYES

DATED: November 7, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ Adrian Kinsella
ADRIAN KINSELLA
Assistant U.S. Attorney
Attorney for the United States

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order. The status conference currently set for November 21, 2023, is continued to Tuesday, January 30, 2024 at 9:30 a.m., and time is excluded through the new status conference date of January 30, 2024 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).

IT IS SO ORDERED.

Dated: November 7, 2023

Dale A. Drozd
DALE A. DROZD
UNITED STATES DISTRICT JUDGE